

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,

Plaintiff,

V.

LAWNS UNLIMITED LTD. and  
EDWARD FLEMING,

Defendants.

Civ. No. 05-495-JJF

**Judge Joseph J. Farnan Jr.**

**PLAINTIFF'S FIRST REQUEST FOR  
ADMISSIONS DIRECTED TO DEFENDANTS**

TO: Eric C. Howard, Esquire  
Wilson, Halbrook & Bayard  
107 West Market Street  
P. O. Box 690  
Georgetown, DE 19947  
COUNSEL FOR DEFENDANTS

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2006 SEP 27 PM 1:00

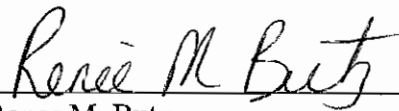
Pursuant to Rule 35 of the Federal Rules of Civil Procedure, Plaintiff Renee M. Butz (hereinafter “Plaintiff”) hereby requests that Defendants Edward Fleming and Lawns Unlimited Ltd. respond to the following requests for admission within 30 days after service of this request.

1. Admit that you attended plaintiff's wedding on September 6, 2003, and that on that date you were aware that plaintiff was pregnant.
2. Admit that during a telephone conversation with plaintiff on December 23, 2003, plaintiff advised that her pregnancy leave would begin effective December 23, 2003.
3. Admit that during a telephone conversation with plaintiff on December 24, 2003, you advised plaintiff that she would be permitted to take a maternity leave, but that she would be

required to sign an employment contract conditioning plaintiff's return to work with Defendant Lawns Unlimited Ltd..

4. Admit that the following employees had requested, and were granted, a leave of absence from Defendant Lawns Unlimited Ltd. during the period 2002-2004: Raul Ramirez-Castaneda (aka Roberto Gonzalez), David Lopez-Rivas, Juan Ramirez, Antonio Santay, and Gregorio Vazquez.

5. Admit that no other employee has been required to sign an employment contract as a condition for a leave of absence.

  
\_\_\_\_\_  
Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 9/27/06

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,

Plaintiff,

v.

LAWNS UNLIMITED LTD. and  
EDWARD FLEMING,

Defendants.

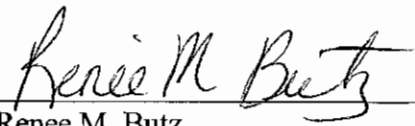
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Civ. No. 05-495-JJF  
Judge Joseph J. Farnan Jr.

AFFIDAVIT OF SERVICE

I hereby affirm that a true and correct copy of the foregoing Plaintiff's First Request for Admissions Directed to Defendants was sent by first-class United States mail, postage duly paid, on this 27<sup>th</sup> day of September, 2006, to counsel of record as follows:

Eric C. Howard, Esquire  
Wilson, Halbrook & Bayard  
107 West Market Street  
P. O. Box 690  
Georgetown, DE 19947

  
\_\_\_\_\_  
Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 9/27/06